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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ADINA RINGLER, KRISTA ROBLES,
JAY SMITH, and JANA RABINOWITZ,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

THE J.M. SMUCKER COMPANY,

Defendant.

Case No. 2:25-cv-01138-AH-E

DISCOVERY MATTER

**DECLARATION OF LILACH H.
KLEIN IN SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL COMPLIANCE WITH
SUBPOENA *DUCES TECUM***

Date: January 23, 2026

Time: 9:30 a.m.

Ctrm: 750

Judge: Hon. Charles F. Eick

Action Filed: Feb. 10, 2025

Discovery Cutoff: Sep. 30, 2026

Pretrial Conference: Feb. 3, 2027

Trial Date: Feb. 23, 2027

1 I, Lilach H. Klein, hereby declare as follows:

2 1. I am a member in good standing of the State Bar of California and of
3 the United States District Courts for the Northern, Central, Eastern and Southern
4 Districts of California. I submit this Declaration in Support of Plaintiffs' Motion to
5 Compel Compliance with Subpoena *Duces Tecum*. I make this Declaration based on
6 my personal knowledge and if called to testify, I could and would competently testify
7 to the matters contained herein.

8 2. In its responses to Plaintiff Ringler's Requests for Admission,
9 Defendant stated that it lacks information regarding how the citric acid used in its
10 Products is manufactured, including whether the citric acid was extracted from
11 natural citrus juice or manufactured using *Aspergillus niger*.

12 3. In its responses to Plaintiff Ringler's Interrogatories, Defendant
13 identified Harris & Ford, LLC as its sole citric acid supplier.

14 4. In response to a Rule 45 subpoena by Plaintiffs, Harris & Ford, LLC
15 identified BBFY Industrial USA, Inc. as a manufacturer of the citric acid used in the
16 Products. On December 19, 2025, Harris & Ford, LLC provided permission to
17 Plaintiffs' counsel to file this information publicly.

18 5. Attached hereto as **Exhibit 1** is a true and correct copy of the Subpoena
19 to Produce Documents Plaintiffs served on non-party BBFY Industrial USA, Inc.
20 ("BBFY").

21 6. Attached hereto as **Exhibit 2** is a true and correct copy of the proof of
22 service of the subpoena showing service on BBFY on November 19, 2025.

23 7. BBFY did not formally respond to the subpoena. Thus, BBFY neither
24 produced documents nor served formal objections.

25 8. Attached hereto as **Exhibit 3** is a true and correct copy of the email
26 chain between BBFY and Plaintiffs' counsel.

27 9. Other than the initial email from BBFY on November 21, 2025, to date,
28 Plaintiffs' counsel received no further correspondence from BBFY or response to

1 the subpoena.

2
3 I declare under penalty of perjury of the laws of the United States that the
4 foregoing is true and correct.

5
6 Executed on this 22nd day of December, 2025 at Sacramento, California.

7
8
9 Dated: December 22, 2025

CROSNER LEGAL, P.C.

10
11 By: /s/ Lilach H. Klein

12 Lilach H. Klein

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